

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to

**DEFENDANTS' MEET AND
CONFER STATEMENT**

All Cases

The undersigned counsel for Defendants 3M Company and Arizant Healthcare Inc. ("Defendants") certifies that counsel for Defendants met and conferred with Plaintiffs' counsel by telephone and email on multiple occasions concerning the topic of foreign discovery before Defendants filed this motion. Defendants' counsel and Plaintiffs' counsel also exchanged drafts of this motion on or about June 22, July 7 and July 8, 2016. Plaintiffs objected to the timing and scheduling of certain foreign depositions that involve third-parties who agreed to appear voluntarily, but have not specifically objected to the request for letters rogatory regarding those third-party witnesses for whom compulsory process is necessary; in fact, Plaintiffs' counsel has indicated that they will not oppose this present motion.

Dated: July 8, 2016

Respectfully submitted,

s/Bridget M. Ahmann

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